

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NICOLE EKBLAD (F/N/A NICOLE  
MARIE MILLER),

Plaintiff,

Case No.: 1:22-CV-00584

v.

Hon. Hala Y. Jarbou

ALLEGAN PUBLIC SCHOOL DISTRICT  
A/K/A ALLEGAN PUBLIC SCHOOLS, JAMES  
BAIRD, WILLIAM HAMMER, KEVEN  
HARNESS, JIM MALLARD and GARY ELLIS,  
individually and in their official capacities,

**ORAL ARGUMENT REQUESTED**

Defendants.

Parker G. Stinar (P75252) WAHLBREG - WOODRUFF Attorneys for Plaintiff 4601 DTC Boulevard, Suite 950 Denver, CO 80237 (303) 571-5302 <a href="mailto:parker@denvertriallawyers.com">parker@denvertriallawyers.com</a>	Craig R. Noland (P30717) Bogomir Rajsic, III (P79191) McGRAW MORRIS P.C. Attorneys for Defendant Baird 300 Ottawa Avenue, NW, Suite 820 Grand Rapids, MI 49503 (616) 288-3700/Fax (616) 214-7712 <a href="mailto:cnoland@mcgrawmorris.com">cnoland@mcgrawmorris.com</a> <a href="mailto:brajsic@mcgrawmorris.com">brajsic@mcgrawmorris.com</a>
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**DEFENDANT JAMES BAIRD'S MOTION TO DISMISS**  
**PURSUANT TO FED. R. CIV. P. 12(B)(6)**

NOW COMES Defendant James Baird, by and through his attorneys, McGraw Morris,  
P.C., and hereby moves this Court, pursuant to Fed. R. Civ. P. 12(b)(6), to enter an order dismissing

Plaintiff's Complaint with prejudice for the reasons stated in the accompanying brief in support of this Motion.

McGRAW MORRIS, P.C.  
Attorneys for Defendant James Baird

Dated: December 16, 2022

BY: s/ *Bogomir Rajsic, III*  
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